Message

From: Freise, Clark [Clark.Freise@des.nh.gov]
Sent: 10/1/2018 3:48:26 PM
To: 'Laurene Allen' Personal Email / Ex. 6
CC: geoffdaly@mkd-usa.com; don@provencher.com; Dunn, Alexandra [dunn.alexandra@epa.gov]; Personal Email / Ex. 6
Subject: RE: Air emission tests
Attachments: ATT00001.txt

Laurene,

PFOA has always had an air ambient limit (AAL). Saint-Gobain had once previously exceeded that limit, but they have been in compliance to that limit for years. The latest testing confirmed they are within that limit. That limit (AAL) is only for inhalation risk, it does not account for the risk of groundwater impacts. Under HB1101/SB309 we are now able to look at that potential impact. That is what the current testing and pilot treatment efforts address. The MS vs. MA is just which tower at the plant is being referenced. They have given them various designations over the years (one is called MA, one is called MS). I agree that our concerns do not end at PFOA and PFOS. That is why we worked with the legislation to be authorized to set MCLs for two additional compounds beyond those two. It is also why we have always tested for the broadest array of analytes that labs could cover, and why we are working with EPA Office of Research and Development, who has even more advanced capabilities than any of the commercial labs. While we may not know the health effects of every compound, we want to make sure people are informed to the greatest extent we can.

Clark

From: Laurene Allen Personal Email / Ex. 6
Sent: Friday, September 28, 2018 11:20 PM
To: Freise, Clark
Cc: geoffdaly@mkd-usa.com; don@provencher.com; dunn.alexandra@epa.gov; Personal Email / Ex. 6
Subject: Air emission tests

Clark
I was reviewing the emails Geoff Daly initiated with you about the air stack testing completed in May of this year not being released yet and have some questions. I am not an engineer so perhaps I am missing something here, but I do review and read all one stop documents as do several others who advocate for the persistent and long term contamination of our communities.

You stated to Geoff that air test data was last done in 2016 and it did not exceed the approved permits.
Were you referencing Permitting for PFAS emissions (are they assigned EPA health advisories as are water and contact soil as they are not a regulated chemical class ?) or for the other manufacturing chemicals that are regulated by the EPA?
There seems to be a bit of a communication issue or I am misunderstanding, as I was certain I had seen tower tests from 2017 which I looked through my own files for and found the following:

STATION ID:	MA_TOWER
STATION:	MA TOWER RESIDUE MERRIMACK
DISPLAYING:	23 records

Filter By Parameter: None

Filter By Date: Starting: Ending:

Apply Filter

DATE	ACTIVITY ID	PARAMETER	RESULTS	METHOD	STATUS	RESULTS VALID
6/29/2017 01:30 PM	1700885-01	2-(N-ETHYLPERFLUORO-A-OCTANESULFONAMIDO)-ETHANOL - N-ETFOSE	< 199 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	2-(N-METHYLPERFLUORO-A-OCTANESULFONAMIDO)-ETHANOL - N-MEFOSE	< 199 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	8:2 FLUOROTELOMERSULFONATE - 8:2 FTS	< 39.7 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	ETHYLPERFLUORO-1-OCTANESULFONAMIDE - N-ETFOSA	< 199 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	FLUOROTELOMER SULFONATE 6:2	< 39.7 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	METHYLPERFLUORO-1-OCTANESULFONAMIDE - N-MEFOSA	< 199 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	PERFLUORO-N-TRIDECANOIC ACID - PFTRDA	< 39.7 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	PERFLUOROBUTANESULFONIC ACID	< 39.7 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	PERFLUOROBUTANOIC ACID - PFBA	196 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	PERFLUORODECANE SULFONATE - PFDS	< 39.7 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	PERFLUORODECANOIC ACID - PFDA	43.1 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	PERFLUORODODECANOIC ACID - PFDOA	51 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	PERFLUOROHEPTANE SULFONATE - PFHPS	< 39.7 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	PERFLUOROHEPTANOIC ACID - PFHPA	52 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	PERFLUOROHEXANOIC ACID - PFHXA	254 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	PERFLUOROHEXYLSULFONIC ACID	< 39.7 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	PERFLUORONONANOIC ACID - PFNA	< 39.7 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	PERFLUOROOCTANESULFONAMIDE - FOSA	< 39.7 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	PERFLUOROOCTANOIC ACID - PFOA	640 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	PERFLUOROOCTYLSULFONIC ACID	< 39.7 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	PERFLUOROPENTANOIC ACID - PFPEA	107 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	PERFLUOROTETRADECANOIC ACID - PFTEDA	< 39.7 NG/G DRY	537 MOD	FINAL	UNKNOWN
6/29/2017 01:30 PM	1700885-01	PERFLUOROUNDECANOIC ACID - PFUNA	45.9 NG/G DRY	537 MOD	FINAL	UNKNOWN

Could you please clarify this issue for me?
Also what is the difference between an MS tower and an MA tower that would explain the higher test results in the MS tower residue?

And finally, one of the points of the PFAS Investigation that has always bothered me is from the start is that particles via air emissions was initially communicated as the source of our contamination yet the company was allowed to continue to do business as usual, emitting from 13 unfiltered air stacks. As I know DES is aware, the discontinuation of PFOA/PFOS and the use of replacement chemicals from approximately 2015 on does not make this chemical class safer, it's simply not acknowledged. While I do understand that your job is regulation, our health impacts are the elephant in the room and I do believe that many fine scientists I have spoken to in your agency are aware that our exposure must be considered as a complete cocktail of PFAS .
The air emissions bill does not give the health protections we need and I have grave concerns for children as well as vulnerable populations that have had and continue to have PFAS exposure via ingestion, inhalation, local produce, fish and biosolid and many other pathways. Sadly, we are far behind and need precautionary measures in place now as the qualities of Gen X that we have been exposed to via a steady stream of air emissions since 2015 are the most troubling threat we face and if a pass through gathering of

health data were to be done it I believe it would be very damaging to the makers and users of this chemical class.
In the words of Dr Linda Birnbaum at the Senate hearing this week “we are not going to be able to test our way out of this”

Regards and Thank you for the difficult job you have,
Laurene